# Exhibit F

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MAR'BELLA SANDOVAL, Individually and
on behalf of all others similarly situated,

            Plaintiff,

v.

SERCO, INC.,

            Defendant.

Case No. 4:18-cv-01562-JAR

## DECLARATION OF RONALD "DALE" MIDDAUGH

I, Ronald "Dale" Middaugh, pursuant to 28 U.S.C. § 1746, state as follows:

1.      The facts in this declaration are based on my personal knowledge and, if called as a witness, I could testify competently to them. I understand that providing this declaration is my choice to make and that I will not be treated any differently by Serco based on my decision. I have not been pressured in any way in making this decision; I provide this declaration voluntarily. I understand that it may be used as evidence in the above-captioned lawsuit.

2.      I was hired by Serco in September 2013 and have served as a Task Supervisor for the London, Kentucky facility throughout my tenure with the company. I have significant experience in supervising, managing, and interacting with hourly employees. I currently report to Deputy Site Manager (DSM), who manages approximately 6-7 Serco Supervisors.

3.      The London facility is one of three facilities that services the company's contract with the U.S. Department of Health and Human Services (DHS), Center for Medicare and Medicaid Services (CMS) to provide support services in determining eligibility for the federal health insurance exchanges under the Patient Protection and Affordable Care Act. I have been a Task Supervisor in various areas of the project, overseeing a number of different work streams and

supervising between 6 and 40 employees at a time.

4.       A work stream is a specific type of task that is handled by the London facility. Such tasks include, for example, scanning and processing mail when it comes in; document validation, which involves reviewing documents to ensure that they match what is in system; handling appeal processes; and resolving inconsistencies in applications. The tasks that are performed are largely driven by our consumers.

5.       Unlike other Serco facilities, the London facility is the only CMS site that has an operational mailroom facility. In my opinion, I would not consider the London facility to be a "call center," as that term is generally understood. Rather, it is more akin to a document processing center in which outbound calls may be placed when the documents provided by the consumer are not sufficient to resolve their application inconsistencies or when the consumer has not submitted documents that are needed within a specified timeframe.

6.       Although I have managed teams comprised of General Clerk 3s (GC3s) in the past, I currently manage a team of ten General Clerk 2s (GC2s) and one General Clerk 2 Bilingual (GC2B). My team works Tuesday through Sunday, from 6:30 a.m. to 3:00 p.m. ET. They are not permitted to make any calls before 8:00 a.m. ET. Among other things, they are primarily responsible for document validation, handling miscellaneous correspondence from customers, and some data matching, such as confirming citizenship.

7.       No one on my team handles in-bound calls; rather, Eligibility Support Workers (ESWs) at the London facility who handle calls handle out-bound calls only, most of which are very short. However, there are occasions when the length of a call may be increased due to issues like the consumer not understanding what is needed or when there is a language barrier. If a call like this causes an employee to work past his or her scheduled shift, which is rare, then I absolutely expect the ESW to record that extra time on his or her timesheet.

8.      Some of the tasks that my team completes do not require making phone calls, such as document validation, expiration processing, and certain tasks that involve confirming permanent resident status if an I-551 (Permanent Resident Card) is available. On average, depending on the work assignment, my current team spends no more than about 20% of their time on calls. The rest of their time is spent completing tasks that may or may not require a phone call.

9.      My last team consisted of 37 Seasonal GC2s. That team was primarily trained on document validation, including, for example, divorce decrees, birth certificates, Social Security cards, driver licenses, and paystubs. They reviewed information that had been uploaded by a scanner that input the information contained on the documents for accuracy. If the information on the scanner did not match that which was on the documents, they corrected it if possible or left the field blank so that an outbound call could be made later in process if required. Unlike some other GC2s, those on that particular team did not make outbound calls immediately upon being hired. After a few months, they were trained on additional tasks, such as making warning calls and inconsistency follow-up calls. Even then, those on my team did not spend a significant amount of time on the phone.

10.     I also previously managed a team of GC3s. The size of my team varied from 7 to 20 employees. That team worked on complex issues with a primary focus on immigration status issues, as well as identity proofing. Employees on that team spent approximately 65-70% of their time on tasks that did not require them to be on the phone.

11.     I typically begin each shift by leading a team huddle with members of my team. This does not occur every shift, however, because from time to time there are other events or training opportunities taking place that I must attend.

12.     The majority of individuals on my team arrive for their shift at exactly 6:30 a.m. I have never instructed members of my team that they need to arrive any earlier than when their
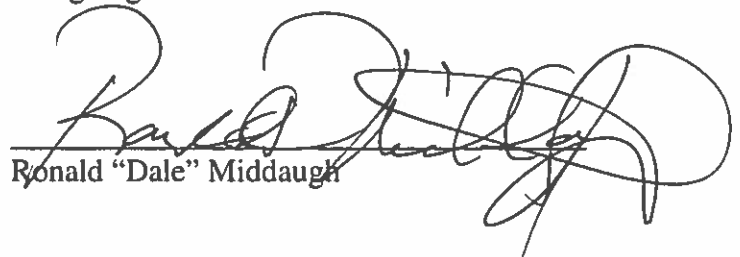
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shift begins. I also do not expect my team members to have logged into the system by the start of their shift. Rather, I prefer that they give me their undivided attention and listen closely during team huddles and then begin logging in after the huddle ends.

13.      Approximately 15 minutes before the end of their shift, I direct my team members to switch to a non-ops desktop to check their email and complete their timesheet. In order to switch from an ops desktop to a non-ops desktop, the employee simply clicks Control + Alt + F12, which logs him or her out and takes them to the log-on screen. At that point, the employee is able to choose which desktop he or she wants to access. Deltek, Serco's timekeeping system, is on the non-ops desktop. Once the employee finishes entering his or her time in his or her timesheet on Deltek, the employee logs off Deltek, clicks the "Start" button, and chooses the option to log off.

14.      I have never had an employee complain to me that he or she worked any amount of time, including overtime hours, but were unable to enter the time on Deltek or otherwise record them.

15.      Occasionally, someone on my team may handle a task that causes them to work a few minutes past the end of their shift. That is extremely rare. When it happens, the employee records all of their time, including any time they worked beyond their scheduled shift, and notifies me. In those instances, I will typically authorize the employee to leave his or her shift early the following day. Nevertheless, if the employee exceeds 40 hours for the workweek, which runs from Saturday to Friday, then he or she will be paid for working overtime hours.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 21, 2018.

Ronald "Dale" Middaugh